

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

AVR GROUP, LLC, TRIDENT  
ASSET MANAGEMENT, INC.,  
MICHAEL DZIURGOT, individually  
and as the representatives of a class of  
similarly-situated persons,

Plaintiffs,

vs.

ALEBRIJE ENTERTAINMENT, LLC,  
CRAIG COLE, MATTHEW COLE,  
GUSTAVO MONTAUDON, and John  
Does 1-10,

Defendants.

Case No. 1:24-cv-20755

---

**DEFENDANT MATTHEW COLE'S CERTIFICATE OF INTERESTED  
PARTIES AND DISCLOSURE STATEMENT**

---

Pursuant to Federal Rule of Civil Procedure, Rule 7.1, Defendant Matthew Cole hereby files the instant *Certificate of Interested Parties and Disclosure Statement*:

**I. INTERESTED PARTIES**

The name of each person, attorney, association of persons, firm, law firm,

partnership, and corporation that has or may have an interest in the outcome of this action — including subsidiaries, conglomerates, affiliates, parent corporations, and other identifiable legal entities related to any party in the case:

**Matthew Cole**

Resident of Ada County, Idaho  
c/o Stearns Weaver Miller Weissler Alhadeff & Sitterson, P.A.  
150 West Flagler St., Suite 2200  
Miami, FL 33130  
*Defendant*

**Stearns Weaver Miller Weissler Alhadeff & Sitterson, P.A.**

150 West Flagler St., Suite 2200  
Miami, FL 33130  
*Counsel for Defendant, Matthew Cole*

**Christopher R. Clark**

Stearns Weaver Miller Weissler Alhadeff & Sitterson, P.A.  
150 West Flagler St., Suite 2200  
Miami, FL 33130  
*Attorney for Defendant, Matthew Cole*

**Michael J. Harwin**

Stearns Weaver Miller Weissler Alhadeff & Sitterson, P.A.  
150 West Flagler St., Suite 2200  
Miami, FL 33130  
*Attorney for Defendant, Matthew Cole*

**AVR Group, LLC**

c/o LOFTUS & EISENBERG, LTD.  
161 Clark, Suite 1600  
Chicago, Illinois 60601  
*Plaintiff*

**Trident Asset Management, INC.**

**c/o LOFTUS & EISENBERG, LTD.**  
162 Clark, Suite 1600  
Chicago, Illinois 60601

*Plaintiff*

**Michael Dziurgot**

c/o LOFTUS & EISENBERG, LTD.

163 Clark, Suite 1600

Chicago, Illinois 60601

*Plaintiff*

**LOFTUS & EISENBERG, LTD.**

161 N. Clark, Suite 1600

Chicago, Illinois 60601

*Counsel for Plaintiffs*

**Joseph McNulty**

c/o LOFTUS & EISENBERG, LTD.

164 Clark, Suite 1600

Chicago, Illinois 60601

*Owner of AVR GROUP, LLC, TRIDENT ASSET MANAGEMENT, INC*

**Alebrije Entertainment, LLC**

c/o Law Office of Adam I. Skolnik, P.A.

1761 West Hillsboro Blvd., Suite 207

Deerfield Beach, FL 33442

*Defendant*

**Gustavo Montaudon**

c/o Law Office of Adam I. Skolnik, P.A.

1761 West Hillsboro Blvd., Suite 207

Deerfield Beach, FL 33442

*Defendant*

**Law Office of Adam I. Skolnik, P.A.**

1761 West Hillsboro Blvd., Suite 207

Deerfield Beach, FL 33442

*Counsel for Defendant Gustavo Montaudon & Alebrije Entertainment, LLC*

**Craig Cole**

c/o Stumphauzer Kolaya Nadler & Sloman

2 South Biscayne Blvd, Suite 1600

Miami, FL 33131

*Defendant*

**Stumphauzer Kolaya Nadler & Sloman**

2 South Biscayne Blvd, Suite 1600

Miami, FL 33131

*Counsel for Defendant Craig Cole*

**Michele Vives, Esq.**

Court Appointed Receiver of 1inMM Capital, LLC

Katten Muchin Rosenman, LLP

525 W. Monroe St.

Chicago, IL

(312) 902-5200

**II. RULE 7.1 DISCLOSURE STATEMENT**

Defendant, Matthew Cole, is an individual and citizen of Idaho residing in Ada County, Idaho, and is not subject to the corporate disclosure requirements as an individual.

Respectfully submitted,

**/s/Michael J. Harwin**

Michael J. Harwin, Esq.

Florida Bar No.: 1018578

Stearns Weaver Miller Weissler Alhadeff &  
Sitterson, P.A.

200 East Las Olas Boulevard, Suite 2100

Fort Lauderdale, FL 33301

Telephone: 954-462-9512

[mharwin@stearnsweaver.com](mailto:mharwin@stearnsweaver.com)

[mhernandez@stearnsweaver.com](mailto:mhernandez@stearnsweaver.com)

And

Christopher R. Clark, Esq.

Florida Bar No.: 1002388

Stearns Weaver Miller Weissler Alhadeff &  
Sitterson, P.A.

106 East College Avenue, Suite 700

Tallahassee, FL 32301

Telephone: 850-329-4853

[crclark@stearnsweaver.com](mailto:crclark@stearnsweaver.com)

[lrussell@stearnsweaver.com](mailto:lrussell@stearnsweaver.com)